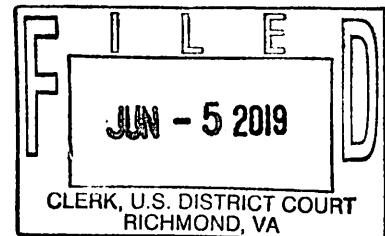


IN THE DISTRICT COURT OF RICHMOND CITY  
STATE OF VIRGINIA

Tina Darden  
3316 Fox Chase Drive  
Midlothian, VA 23112



Petitioner/Plaintiff )

)  
)

NO.

3:19-cv-00415-JAG

Vs. )

Big Lots Inc. Store 1069 )  
Reg. Agent Corp. Service )  
Company (Ref. Claim #17-  
0212297)

Respondent/Defendant )

)

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COMPLAINT

COMES NOW -- Tina Darden, Plaintiff, and in support of her claim for relief would show unto the Court the following facts, to-wit:

1. That Tina Darden is an actual adult resident citizen of Chesterfield County, Virginia (Midlothian, VA)
2. That the Defendant is a store trading as Big Lots, Inc., store number 1069, and after due diligence, no personal ownership was revealed when requested at a corp. level, or by any store posting or request. The state corp. commission of Virginia Lists no person as a registered agent, rather list the agent as the corp. name: Corporation Service Company, 100

Shockoe Slip #12, Richmond, VA. This is where process of service shall be made.

3. This Court has jurisdiction of the parties and of the subject matter of this cause.

4. Plaintiff would show that on or about June 8, 2017, I was injured by no fault of my own, when improperly secured tables fell onto my right foot causing injury.

5. Plaintiff would show that Defendant failed to provide a safe and secure display, and through negligence had an unsafe display causing my injury. All documentation was given to the Corp. Litigation office, as requested, such documents are in the possession of a claim's adjuster named Ms. Glenna Flemings. (reference claim # 17-0212297).

6. As a proximate result of these breaches of duty, Plaintiff has suffered documented injury, in specific: Contusion/Crush Injury Right Foot.

WHEREFORE, PREMISES CONSIDERED, Plaintiff files this suit and demands judgment of and from the Defendant for \$8,058.21 for injury damage and \$6,941.79 for significant pain and suffering, inconvenience, mental anguish, severe limitation of defendant's daily functioning. requiring outside help. Extreme stress aggravates MS symptoms. That is why I required 21 days for recovery. My documented MS symptoms were enhanced by failure of Big Lots, Inc. representative, ie, of not dealing in good faith, as evidenced by a \$500 offer to settle, an amount that does not even cover medical costs, forcing this action and continuing my pain and suffering. The Plaintiff reserves the right to petition a higher court if no resolve is made in a timely manner. Plaintiff reserves the right to amend the pleadings or request change of venue, if necessary, due to my MS disability. Plaintiff further demands interest and all costs of this action.

7. Take notice of supporting documentation listed as attachments which are some of the most pertinent to this action, along with a list of some of documentation already submitted to Big Lots, Inc. Legal Department.

Dated:

6/5/19

Respectfully submitted,



Name: Tina Darden  
Address: 3316 Fox Chase Drive  
City, State, Zip: Midlothian, VA  
23112  
Phone: (804) 814-6595  
E-mail: tina.darden@verizon.net

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